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Debtor and Debtor in Possession
8

9 **UNITED STATES BANKRUPTCY COURT**
10 **CENTRAL DISTRICT OF CALIFORNIA, LOS ANGELES DIVISION**
11

12 In re:
13 SEATON INVESTMENTS, LLC, *et al.*,
14
15 Debtors and Debtors In
Possession.

- 16 ☐ Affects All Debtors.
17 ☐ Affects Seaton Investments, LLC
18 ☐ Affects Colyton Investments, LLC
19 ☐ Affects Broadway Avenue Investments, LLC
20 ☐ Affects SLA Investments, LLC
21 ☐ Affects Negev Investments, LLC
22 ☒ Affects Alan Gomperts
23 ☐ Affects Daniel Halevy
24 ☐ Affects Susan Halevy

Lead Case No. 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:
2:24-bk-12080-VZ; 2:24-bk-12081-VZ;
2:24-bk-12082-VZ; 2:24-bk-12091-VZ;
2:24-bk-12074-VZ; 2:24-bk-12075-VZ and
2:24-bk-12076-VZ

Chapter 11

**NOTICE OF MOTION FOR ENTRY
OF ORDER AUTHORIZING
DEBTOR TO MAINTAIN
PREPETITION BANK ACCOUNTS**

Hearing:

Date: June 11, 2024
Time: 11:00 a.m. PST
Courtroom: 1368
255 East Temple St.
Los Angeles, CA 90012

25 **TO THE HONORABLE VINCENT P. ZURZOLO, UNITED STATES**
26 **BANKRUPTCY JUDGE, AND INTERESTED PARTIES:**
27

28 **PLEASE TAKE NOTICE** that on June 11, 2024, at 11:00 a.m., debtor Alan

SAUL EWING LLP
5 PARK PLAZA, SUITE 650
IRVINE, CALIFORNIA 92614
(949) 252-2777

1 Gomperts (the “Debtor”) will move before the Honorable Vincent P. Zurzolo, in the United States
2 Bankruptcy Court, Central District of California, Los Angeles Division, Courtroom 1368, for the
3 relief requested in the Motion for Entry of an Order Authorizing the Debtor to Maintain Prepetition
4 Bank Accounts (the “Bank Account Motion”).

5 The Bank Account Motion is based upon this notice, the Memorandum of Points and
6 Authorities appended to the Bank Account Motion, the Declaration of Alan Gomperts filed
7 contemporaneously therewith, and such other evidence as may be presented to the Court.

8 Copies of the moving papers may be requested by email to the undersigned Debtor’s counsel.

9 **PLEASE TAKE FURTHER NOTICE** that pursuant to Local Bankruptcy Rule 9013-1(f),
10 each interested party opposing, joining, or responding to the Application must, no later than 14 days
11 before the date of the hearing, file with the Clerk of the Bankruptcy Court and serve upon counsel
12 for the Debtor, Zev Shechtman, Saul Ewing LLP, 1888 Century Park East, Suite 1500 Los Angeles,
13 California 90067, Zev.Shechtman@saul.com, and the United States Trustee, 915 Wilshire Blvd.,
14 Suite 1850, Los Angeles, California 90017, either: (i) a complete written statement of all reasons in
15 opposition thereto or in support or joinder thereof, declarations and copies of all photographs and
16 documentary evidence on which the responding party intends to rely, and any responding
17 memorandum of points and authorities; or (ii) a written statement that the Bank Account Motion
18 will not be opposed.

19 Pursuant to Local Bankruptcy Rule 9013-1(h), failure to timely file and serve papers may be
20 deemed by the Court to be consent to the granting of the Bank Account Motion.

21
22 DATED: May 7, 2024

SAUL EWING LLP

23
24 By: /s/ Turner N. Falk

25 TURNER N. FALK
26 Attorneys for Alan Gomperts
27 Debtor and Debtor-in-Possession
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